Violation of 42 USC \$ 1983 based on Deprivation of frontleth Amendment;

Right to Equal Protetion by refusing Plaintiff access to long hair medical pass and sex stereotyping the Plaintiff as made, that will look made, ait made based on Hetro sexual Standards.

Your Honor, evidence has established that immote Kosilek of the 1st circuit and adopted by the staticircuit is the bendmark Standard by which to measure 'Similarly Situated' and the non-invasive medical care needed to Establish when a individual is similarly situated to comparators.

Using the bench mark (Kesilek) the inquiry is case specific and requires the court to consider the full rargety of factors that an objectively reasonable decision maker would find relevant in making the challenged decision.

The bench work abous the court the entity of what the Plaintiff should recipie as a transferder similarly situated to a consgender female inmate and what the Defendants Reight as adquate medical care for transgenders in the Corpus christi Division.

An example of the Defendants sex-sterestyping the Plaintiff should recious a medical pass for the Plaintiff to grow her have to Stondard Lemble affector lenth.

tocal medical providers, when asked for such a pass, respond by claiming they (TDCT) would not let us do it,

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However, TDC grooming standards, AD-03:83, allows for full
length (+0 6houlders) hair due to documented medical or religious expreptions.

TDET presently allows inmate who are of the Seikh religion to wear long hair.

TICT has no policy nor custom that denies long have, to the medical or religious

whether it is legal for the 'Seith' religion to have long hair, lost no one who is not seith' is a whole other tall of wax. It is discrimination on religious growns, one religion can, but not a Grender Dysporia who converts to beth can have long hair, but not a Grender Dysporia who is Canholic (A religious Salkhi heter escaved may hove long hair but not a religious non-'seith Gender Dysporia? Three Modified Marchan offenders have already won a suit for long hair also. There are many Modified American affections those that the Continue of their hair depletes their leaght of their life energy: Here again we have discrimination and sat-stereotyping. Since TDCT policy does allow for long hair in certain instances and since the Plaintiff does meet those discrimination and

The have just examinal TDCI's policy- Now we move to the Defendants policy.

CMAC. A-08. 8 Policy

A health care provider may order a madrical pass for any offender with medical needs that can not be med without special accomplations, such passes are to be based structly on medical needs and should not

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The court can plainly see that, although Datendants actions of discrimination and Sex-Stereotyping, TDCT does allow for long hair to be and the Defendants own Policy AD-08.8, also allows for such.

Therefore, it is clear that the Defendants if they can not provide the courts with a specific directive from TDCT or a specific individual who orotted, or privated a directive that is contrary to codified regulations are

- A) Either lying to the court by claiming TOCT wort let us issue long hair passes
- 13) They are impinging on the Plaintill's conflictational rights of their own accord.
 - Othere is collision between both parties for joint impinging without one process

There is no significant government issue pretaining to the demial of non-invasive treatment for Grender Dysporia by issueing a bug hair pass as other affecters.

Peterdants, both claim the other one won't let them issue long hair passes.

This is arbitary and irrational. In the end, its the Plaintiff that is denied equal protection for a long hadropass, as similar situated Kosilek has or a cisgender fearale inmate

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The Probability is ser-stereotyped as a male, forced to wear a males

short hair, this is irrational and arbitary as all get out.

30, lets a jory eximine the witness, evaluate their demeasur, evaluate their versions of why a long hair medical pass is not issued to a transgender

Going to a jury could go cother way, for the Dodonbowns or the Plaintiff.

the Plainted encloses letters to the Defendants for the Courts reading, in a affort to bring clarity

This serves no emphrament Goldernton 1:3 us that is even related to that intrest,

Discovery Item #30

Policy Gi 51.11 is not mentioned in their violation. This is strictly a 1strict error that kesilek was all allowed long wait do to she was hing as a woman and is similar situated to a disgender tende inmate, as the Asimilar.

All conditions precedents were performed or occured